



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463  
July 13, 2000

RQ-3

Anne P. Petera, Treasurer  
Republican Party of Virginia Inc.  
115 East Grace Street  
Richmond, VA 23219

Identification Number: C00001305

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Ms. Petera:

This letter is to inform you that as of July 12, 2000 the Commission has not received your response to our request for additional information, dated June 21, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your Amended April Quarterly Report dated May 26, 2000 that amends the voter drive allocation ratio on Schedule H1 of your report; however, you still need to address the other matters in the letter referenced above. An adequate response must be received at the Commission by August 2, 2000. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Kenneth Davis on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Anne P. Petera, Treasurer  
Republican Party of Virginia Inc.  
115 East Grace Street  
Richmond, VA 23219

Identification Number: C00001305

JUN 21 2000

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Ms. Petera:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please be advised that the ballot composition ratio for allocation of generic voter drive expenses should be the same for state party committees in the same state during calendar year 2000. Schedule H1 of your report discloses the federal portion of 2000 generic voter drive expenses to be 75%. The federal portion is calculated by checking all the offices that will appear on the next general election ballot and dividing the points for federal offices by the total points for all offices. Please verify that your Schedule H1 adequately reflects what will appear on the next general election ballot. If necessary, please amend your report to include a corrected H1.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): expense reimbursement, consulting and professional fees. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the

funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Schedule A supporting Line 17 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(3)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel and membership lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecemeal charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(iii)(B)

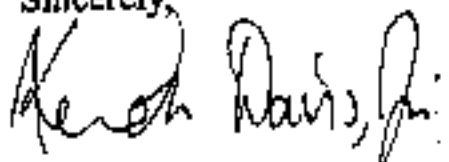
Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(iii)(A))

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions

received from federal candidates should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ken Davis, Jr.", written in a cursive style.

Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division.

# SCHEDULE A

# ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

28 / 74

FOR LINE NUMBER  
17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
Republican Party of Virginia, Inc.

<b>Full Name, Mailing Address, and ZIP Code</b> Billy for Congress P O Box 17095  Richmond VA 23226-7095  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 2378.00	<b>Date (month, day, year)</b> 02/02/2000	<b>Amount of Each Receipt this Period</b> 2378.00 voter list
<b>Full Name, Mailing Address, and ZIP Code</b> Friends of Walter Stosch 4551 Cox Road Suite 110 Glen Allen VA 23060-8740  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 423.24	<b>Date (month, day, year)</b> 02/23/2000	<b>Amount of Each Receipt this Period</b> 423.24 postage reimbursed
<b>Full Name, Mailing Address, and ZIP Code</b> Keyes 2000, Inc. 4700 Sunny Pl  Alexandria VA 22304  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 3332.00	<b>Date (month, day, year)</b> 01/13/2000	<b>Amount of Each Receipt this Period</b> 3332.00 voter list
<b>Full Name, Mailing Address, and ZIP Code</b> McCain 2000, Inc. P. O. Box 25382  Alexandria VA 22313  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 12000.00	<b>Date (month, day, year)</b> 03/07/2000	<b>Amount of Each Receipt this Period</b> 12000.00 volunteer
<b>Full Name, Mailing Address, and ZIP Code</b> Tom Davis for Congress 2459 Dawning Ct  Annandale VA 22003  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 2000.00	<b>Date (month, day, year)</b> 02/02/2000	<b>Amount of Each Receipt this Period</b> 2000.00

SUBTOTALS of Receipts This Page (Optional)

TOTALS This Period (last page this line number only)

20133.24

